UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

KEYBANK NATIONAL ASSOCIATION,

Civil Action No.: 1:20-cv-559-ER

Plaintiff.

NOTICE OF PLAINTIFF'S MOTION FOR DEFAULT JUDGMENT

v.

DIRECT BUILDING PRODUCTS CORP., and YOEL DEEN.

Defendants.

PLEASE TAKE NOTICE that upon the Declaration of Dafney Dubuisson Stokes, Esq., and the exhibits attached thereto, the Proposed Default Judgment Order, and Non-Military Declaration, Statement of Damages, and Certificate of Service, the undersigned, on behalf of Plaintiff, will move this Court before the Hon. Edgardo Ramos, U.S.D.J., at the United States Courthouse, Southern District of New York, 500 Pearl Street, New York, NY 10007, at a date and time to be determined by the Court, for an Order pursuant to Fed. R. Civ. Pro. 55(b)(2) and 9 U.S.C. § 9 et seq., for:

- Entry of default judgment against Defendants Direct Building Products Corp., and Yoel Deen;
- 2. Declaring that Defendants owe \$514,568.51, plus interest, as set forth in the Statement of Damages and Clerk's Certificate of Default; and
- 3. Awarding Plaintiff such other and further relief as the Court deems just and proper.

The motion is DENIED without prejudice for failure to conform to this Court's Individual Rules. The plaintiff is directed to refile a proposed Order to Show Cause and supporting documentation as prescribed by Attachment A of this Court's Individual Rules.

SO ORDERED.

Edgardo Ramos, U.S.D.J

Dated: May. 12, 2020 New York, New York **WONG FLEMING**

Attorneys for Plaintiff
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/s/ Dafney Dubuisson Stokes

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